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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation: WT Docket 3-66 and WC Docket No. 11-42**

Dear Ms. Dortch:

On November 18, 2015, Katherine Messier of Mobile Beacon and John Schwartz of Mobile Citizen met with Jay Schwarz, Ryan Palmer, Garnet Hanly and Jodie Griffin of the Wireline Competition Bureau; Blaise Scinto, Nancy Zaczek, Jean Kiddoo and Sean Conway of the Wireless Telecommunications Bureau; and Jonathan Chambers of the Office of Strategic Planning & Policy Analysis.

Ms. Messier and Mr. Schwartz discussed how Mobile Beacon and Mobile Citizen can play a larger role in achieving Lifeline broadband goals, particularly in addressing the homework gap.

They also discussed that certain ETC requirements (such as the requirement to sell directly to mass market customers) would not make it currently feasible for Mobile Beacon and Mobile Citizen to participate as Lifeline providers. However, they opined if the structure was more flexible to facilitate the inclusion of Educational Broadband Service (EBS) providers, it would create a distribution channel that facilitates greater use of EBS service and reduces the heavy lifting school districts must currently go through as "middle men" to distribute Mobile Beacon's and Mobile Citizen's broadband services to families and collect payment.

Ms. Messier and Mr. Schwartz emphasized that there are opportunities outside of the Lifeline program to promote greater EBS utilization and deployment. They highlighted the key issues addressed in Mobile Beacon's comments and Mobile Citizen's (under its parent organization, Voqal) reply comments in WC Docket No. 11-42; including the current ambiguity and outdated nature of certain portions of EBS rules and suggestions for addressing them. They also updated attendees on the current status of transitioning their broadband users to Sprint's LTE network as a follow-up to the situation they described in their respective WC Docket No. 11-42 comments.

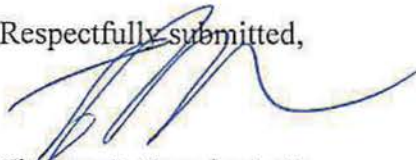
Also in those comments, Mobile Beacon also proposed that EBS be positioned as a platform for lifelong learning. As such, the types of educational organizations that qualify as meeting the FCC educational use requirements should be expanded to a broader range of

educational entities, notably libraries, but also adult education programs and early education programs.

Ms. Messier and Mr. Schwartz discussed the implications of EBS white space being tied up for 20+ years while the opportunities for deploying this spectrum continue to grow. In the last 10 years, more EBS licensees have built their own networks (although this is still the minority of EBS service models). Additionally, the rise in community broadband deployments and lessons learned from libraries' work with TV white space demonstrate there are several new models for EBS licensees to consider besides leasing their spectrum to a commercial provider. Particularly in rural areas, alternative models to leasing show more promise than ever before. Ms. Messier and Mr. Schwartz encouraged the FCC attendees to make this spectrum available for use so it facilitates greater utilization of this band through new entrants and existing EBS licensees.

Lastly, Ms. Messier and Mr. Schwartz discussed the years of usage data they have collected from programs, like school loaner programs, to address the homework gap, library hotspot lending programs, and digital divide end users -- valuable data that shows how much these users will actually use when they are not limited to small data caps.

Respectfully submitted,



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